Montana Fish, Wildlife & Parks

Region 3
1400 South 19th Avenue
Bozeman, MT 59718

USDA

United States Department of Agriculture
Forest Service
Custer Gallatin National Forest
Bozeman Ranger District
3710 Fallon St., Suite C
Bozeman, MT 59718

To whom it may concern: February 29, 2016

Montana Fish, Wildlife & Parks (MFWP) and the Custer Gallatin National Forest (CGNF) are jointly requesting public input on a proposed project to restore native westslope cutthroat trout (WCT) to the headwaters of the North Fork Spanish Creek drainage in the northern Spanish Peaks (See attached map). The North Fork is a tributary to Spanish Creek which joins the Gallatin River approximately 17 miles southwest of Bozeman, Montana. The Gallatin River watershed drains the northwest corner of Yellowstone National Park, flowing northward and entering the Missouri River at Three Forks, Montana. The proposed project area lies mostly within the boundaries of the Custer Gallatin National Forest, including a portion of the Lee Metcalf Wilderness (Spanish Peaks Unit), and one private land parcel.

The proposed project would restore WCT to 17 miles of high quality stream habitat in four (North Fork, Willow Swamp, Placer, and Camp Creeks) interconnected tributaries and eight acres in two headwater high mountain lakes (Big Brother and Chiquita). An upstream migration barrier would be required to prevent the future invasion of non-native trout. A fish barrier location has been identified on private land. A barrier would be constructed, and then all non-native fish would be removed upstream from the barrier location using an EPA-registered fish toxicant with the exception of upper Placer Creek (which already contains genetically pure WCT).

Once all existing fish are removed, MFWP proposes to introduce genetically pure WCT from neighboring populations within the upper Missouri River Basin. Stream habitat within the proposed project area is capable of sustaining a large population of WCT. The involved parties anticipate the project taking up to seven years depending on environmental factors (weather, high stream flows, etc.). The removal of non-native trout and restocking with genetically pure westslope cutthroat trout would fall under the authority of MFWP.

Westslope cutthroat trout were historically the only trout species occupying the Gallatin River drainage. However, the introduction of non-native salmonids and subsequent hybridization and competition has relegated pure WCT populations to a few, small

headwater populations. Only five populations of pure WCT, representing 3.2% of their original range, still exist in the Gallatin River drainage today and two of these are currently being lost to hybridization with rainbow trout. These populations are found in isolated stream reaches, mostly on National Forest system lands, are at a high risk of extinction due to their limited habitat, small population sizes, of hybridization, and catastrophic events (e.g. fire, disease, and drought).

Westslope cutthroat trout are considered a species of concern by the State of Montana and a sensitive species by the U.S. Forest Service. Many similar projects have occurred within the upper Missouri River Basin in recent decades. Cumulatively, these projects help prevent extinction of WCT and listing under the Endangered Species Act. Montana Fish, Wildlife & Parks is mandated through State of Montana statutes to conduct projects to improve the status of imperiled species. Additionally, Montana Fish, Wildlife & Parks Statewide Fisheries Management Plan specifies a goal of 20% occupancy and security of WCT in their historic range.

The Custer Gallatin National Forest would be responsible for permitting the use of piscicides and the use of motorized equipment if needed for project implementation in the Lee Metcalf Wilderness. The Forest Service's Minimum Requirement Decision Guide (MRDG) will be used to analyze the feasibility and impacts of use of motorized equipment, among potential options, to minimize impacts to wilderness character during project implementation. Examples of the types of options analyzed are pack stock (to transport crew, equipment and fish for restocking), aircraft (for restocking), and electric motors (boat and pump, for applying piscicide). The MRDG will be analyzed as part of the project analysis during the State's Montana Environmental Policy Act (MEPA) process. If the overall project is approved by the State, the Forest Service will issue a separate decision (Decision Notice-DN), Finding of No Significant Impact (FONSI), and Pesticide Use Permit (PUP)) tiered to the State's Environmental Assessment, regarding use of piscicides and motorized equipment in the Lee Metcalf Wilderness.

The barrier would be authorized by the private landowner and permitted as required by State and Federal statutes.

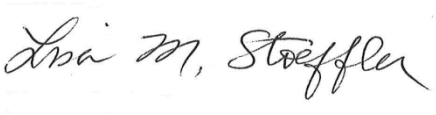
Montana Fish, Wildlife & Parks and Custer Gallatin National Forest are requesting public input and comments on the joint proposed project by March 31, 2016. The Agencies will determine the need for a public meeting(s) based on public interest. If you have any written comments regarding the proposed project, please mail them to Montana Fish, Wildlife & Parks, c/o North Fork Spanish Creek Restoration Comments, 1400 S. 19th Ave., Bozeman, MT 59718 or e-mail them to Dave Moser (davemoser@mt.gov). If you have any questions regarding the proposed project, please call either Dave Moser (MFWP, Area Fisheries Biologist) at (406) 994-6938 or Bruce Roberts (CGNF, Zone Fisheries Biologist) at (406) 522-2544.

Forest Service decisions are subject to the Pre-decisional Administrative Review Process (referred to as the "objection process") pursuant to 36 CFR 218, subparts A and B. Objections will only be accepted from those who have submitted written or oral

comments to either MFWP or FS specific to the proposed project during scoping or other public involvement opportunities (36 CFR 218.5).

Thanks for your time and consideration of this proposed native fish restoration project.

Sincerely,



Sam B. Sheppard
Region 3 Supervisor

Lisa Stoeffler
Bozeman District Ranger

Attachment